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**From:** Jones, Connie [Jones.Constance@epa.gov]  
**Sent:** 3/3/2021 5:48:19 PM  
**To:** Amoroso, Cathy [Amoroso.Cathy@epa.gov]  
**Subject:** RE: DOE's suggested path forward for implementing the ORR FFS dispute decision

DOE was issued some ARARs on 1/19/2021 as part of the Administrator's decision. At a minimum, these should be included. As in the partial draft portions of the ROD that DOE submitted, legal will not review until the ARARs are included in the document.

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**From:** Amoroso, Cathy <Amoroso.Cathy@epa.gov>  
**Sent:** Tuesday, March 2, 2021 2:51 PM  
**To:** Jones, Connie <Jones.Constance@epa.gov>  
**Subject:** RE: DOE's suggested path forward for implementing the ORR FFS dispute decision

Good point. I am thinking the same thing. If the D1 doesn't have ARARs, maybe it is really a D0 (curtesy copy to start review).

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**From:** Jones, Connie <Jones.Constance@epa.gov>  
**Sent:** Tuesday, March 2, 2021 1:25 PM  
**To:** Amoroso, Cathy <Amoroso.Cathy@epa.gov>; Adams, Glenn <Adams.Glenn@epa.gov>; Froede, Carl <Froede.Carl@epa.gov>  
**Cc:** Richards, Jon M. <Richards.Jon@epa.gov>; Alexander, Shanna <Alexander.Shanna@epa.gov>  
**Subject:** RE: DOE's suggested path forward for implementing the ORR FFS dispute decision

I would agree that we should discuss as a group. Also, we really need the ARARs in the D1. Otherwise, we run risk of D2 dispute within review timeframe and will be a legal concern.

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**From:** Amoroso, Cathy <Amoroso.Cathy@epa.gov>  
**Sent:** Tuesday, March 2, 2021 1:11 PM  
**To:** Adams, Glenn <Adams.Glenn@epa.gov>; Froede, Carl <Froede.Carl@epa.gov>; Jones, Connie <Jones.Constance@epa.gov>  
**Cc:** Richards, Jon M. <Richards.Jon@epa.gov>; Alexander, Shanna <Alexander.Shanna@epa.gov>  
**Subject:** DOE's suggested path forward for implementing the ORR FFS dispute decision

All,

Attached is DOE's proposed path forward in implementing the ORR FFS decision with regards to the Landfill wastewater FFS, the EMDF ROD and modification to the EMWMF ROD.

DOE is looking for feedback/buy in. I understand their effort – they want some assurance that we are all on the same page with the plan moving forward.

Significantly, according to this proposal/flow chart,

- ARARs would be in the EMDF D2 ROD, but not in the D1 ROD.
- the D1 and D2 EMDF ROD would be prepared without the revised FFS, then add discharge limits in a future D2 modification.

Can we live with that? Do we need to get together to discuss?

Cathy Amoroso, Chief  
Restoration & DOE Coordination Section

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U.S. EPA, Region 4  
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